

Fill in this information to identify the case:

Bobbi J Maffeo
Cynthia L Maffeo
fka Cynthia L Kirby
Debtor(s)

**UNITED STATES BANKRUPTCY COURT FOR THE: WESTERN
DISTRICT OF PENNSYLVANIA**
Chapter 13 Case Number: 15-70724-JAD

FORM 4100R

RESPONSE TO INTERIM NOTICE OF FINAL CURE PAYMENT

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

PART 1: Mortgage Information

Name of creditor: WELLS FARGO BANK, N.A.

Court claim no. (if known): 41

Last four digits of any number you use to identify the debtor's account: 5932

Property Address: 769 Railroad Street, Windber, PA 15963

PART 2: Pre-Petition Default Payments:

Check one:

- ☒ Creditor agrees that Debtor(s) has/have paid in full the amount required to cure the default on Creditor's claim
- ☐ Creditor disagrees that Debtor(s) has/have paid in full the amount required to cure the pre-petition default on Creditor's claim. Creditor asserts that the total amount due to cure the pre-petition amount remaining unpaid is:

Total Amount Due: \$ ____

PART 3: Post-Petition Mortgage Payments

Check One

☒ Creditor states that the debtor(s) are current with all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

The next post-petition payment from the debtor(s) is due on: 09/01/2018

☐ Creditor states that the debtor(s) are **not** current on all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

(a) Total post-petition ongoing payments due:

(a) \$ ____

(b) Total fees, charges, expenses, escrow and costs outstanding:

(b) \$ ____

(c) **Total.** Add lines a and b.

(c) \$ ____

Creditor asserts that the debtor(s) are contractually obligated for the post-petition payment(s) that first became due: _____

Form 4100R

Debtor(s): Bobbi J Maffeo

Cynthia L Maffeo

fka Cynthia L Kirby

Case Number: 15-70724-JAD

PART 4: Itemized Payment History

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

PART 5: Sign Here

The person completing this Response must sign it. The response must be filed as a supplement to the creditor's Proof of Claim.

Check the appropriate box.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

X/s/ Jill Manuel-Coughlin, Esquire

Jill Manuel-Coughlin, Esquire

Harry B. Reese, Esquire

Date: 10/03/2018

Title: Attorney

Print: Jill Manuel-Coughlin, Esquire

Harry B. Reese, Esquire

Company: Powers, Kirn & Associates, LLC

Address: 8 Neshaminy Interplex, Suite 215
Trevoze, PA 19053

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Contact Phone: 215-942-2030

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Bobbi J Maffeo Cynthia L Maffeo fka Cynthia L Kirby Debtor(s) WELLS FARGO BANK, N.A. Movant v. Bobbi J Maffeo Cynthia L Maffeo fka Cynthia L Kirby Debtor(s)	Case No. 15-70724-JAD
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Statement in Response to Notice of Final Cure Payment was served on the parties listed below by postage-prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on 10/03/2018.

Parties Served via Electronic Notification:

Kenneth P. Seitz, Esquire
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thedebraters@aol.com
 Attorney for Debtor(s)

Ronda J. Winnecour, Esquire
 Suite 3250, USX Tower
 600 Grant Street
 Pittsburgh, PA 15219
cmecf@chapter13trusteewdpa.com
 Trustee

Parties Serviced via First Class Mail:

Bobbi J Maffeo
 Cynthia L Maffeo
 fka Cynthia L Kirby
 769 Railroad Street
 Windber, PA 15963
 Debtor(s)

/s/ Jill Manuel-Coughlin, Esquire
 POWERS, KIRN & ASSOCIATES, LLC
 Jill Manuel-Coughlin, Esquire; Atty ID # 63252
 Harry B. Reese, Esquire; Atty ID #310501
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jill@pkallc.com / harry.reese@pkallc.com
 Attorney for Movant
 Dated: 10/03/2018